

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-80151-CR-CANNON/REINHART**

**UNITED STATES OF AMERICA**

**vs.**

**ISAIAS PEREZ-BARTOLOME,**

**Defendant.**

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**FACTUAL PROFFER**

Had this case proceeded to trial, the United States would have proved beyond a reasonable doubt the following facts:

On or about August 14, 2022, Isaias PEREZ-BARTOLOME was arrested in Palm Beach County, Florida for the offenses of driving under the influence, and driving without a license. He was booked and detained at the Palm Beach County Jail.

A review of the immigration records show that Isaias PEREZ-BARTOLOME is a native and citizen of Guatemala. Records further show that on or about June 4, 2010, Isaias PEREZ-BARTOLOME was ordered removed. The Order of Removal was executed on or about June 16, 2010, whereby Isaias PEREZ-BARTOLOME was removed from the United States and returned to Guatemala.

Isaias PEREZ-BARTOLOME's fingerprints taken in connection with his August 14, 2022, arrest in Palm Beach County were scanned into the IAFIS system. Results confirmed that the scanned fingerprints belong to the individual who was previously removed from the United States, that is, Isaias PEREZ-BARTOLOME.

A record check was performed in the Computer Linked Application Informational

Management System to determine if Isaias PEREZ-BARTOLOME filed an application for permission to reapply for admission into the United States after deportation or removal. After a search was performed in that database system, no record was found to exist indicating that Isaias PEREZ-BARTOLOME obtained consent from the Attorney General of the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law.

The Defendant agrees that the elements of the offense to which he is pleading guilty are:

- a. The Defendant was an alien at the time stated in the Indictment;
- b. The Defendant had been removed or deported from the United States;
- c. Afterward, the Defendant was found to be voluntarily back in the United States;
- d. The Defendant did not have the consent of the Attorney General or the Secretary of Homeland Security for the United States to apply for readmission to the United States.

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

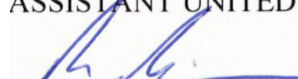
Date: 11/2/22

By:

  
RINKU TRIBUIANI  
ASSISTANT UNITED STATES ATTORNEY

Date: 10/28/22

By:

  
PETER BIRCH  
ATTORNEY FOR DEFENDANT

Date: 10/28/22

By:

  
ISAIAS PEREZ-BARTOLOME  
DEFENDANT